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Attorneys for Defendant Fred Meyer Stores, Inc.

IN THE UNITED STATES DISTRICT COURT
OF THE STATE OF OREGON
PORTLAND DIVISION

SAMANTHA WOODY, APRIL ALLEN,
DELIA CRUZ, CANDICE TRENT, and
NICOLE URVINA,

Plaintiff,

v.

FRED MEYER STORES, INC.,

Defendant.

Case No. 3:22-CV-01800-HZ

JOINT MOTION TO STAY CASE
DEADLINES

LR 7-1 CERTIFICATION

The parties have made a good faith effort to confer and hereby jointly agree to this motion to stay these proceedings.

MOTION

In light of their settlement of this dispute, the parties move this Court for an order under LR 16-3 to vacate and stay all current and pending case deadlines in this matter during the pendency of the Court's decision on Plaintiffs' Renewed Unopposed Motion for Preliminary Approval of Class Settlement.

MEMORANDUM

Plaintiffs and Defendant jointly request this stay because the parties have reached a settlement of this dispute and have fully executed a class settlement that is now pending before the Court for preliminary approval. This motion is made in good faith and not for purposes of delay; rather a stay would conserve judicial resources and reduce unnecessary litigation while the Court considers the proposed settlement. Further, staying the case deadlines will not prejudice any party. To the contrary, it will enable the parties to focus their efforts on facilitating the settlement process and, if approved, the implementation of class notice and settlement.

CONCLUSION

Based on the foregoing, the parties respectfully request that the Court grant this motion and stay all current and pending case deadlines until such time as the Court has ruled on Plaintiffs' Renewed Unopposed Motion for Preliminary Approval of Class Settlement.

Dated: this 6th day of December, 2024

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